

1 Noel Grefenson
2 Attorney at Law
3 1415 Liberty Street SE
4 Salem, Oregon 97302
5 (503) 371-1700
6 Email: Ngrefenson@aol.com

7 Attorney for Josh Hall

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF OREGON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSH HALL,

14 Defendant.

Case No.: CR 10-229 BR

MOTION TO CONTINUE TRIAL

15 Defendant, Josh Hall, by and through counsel, Noel Grefenson, hereby moves the
16 Court to continue trial in this matter for a period of 30 days, from November 14, 2011, until
17 December 14, 2011. This motion is made under 18 U.S.C. § 3161(h)(7)(A),(B) regarding
18 the Speedy Trial Act, the ends of justice served by a postponement of trial will outweigh
19 the best interest of the public and the defendant in a speedy trial.

20 On or about September 17, 2011, the parties reached a plea agreement in this
21 matter. Counsel for the parties further agreed, however, that Mr. Hall's change of plea
22 should not occur until after resolution of his codefendant's case. That case resolved on
23 October 26, 2011. Counsel and Mr. Hall now require additional time to complete formal
24 entry of Mr. Hall's change of plea.

1 Mr. Hall is aware of his speedy trial rights, understands those rights and agrees that
2 a continuance of trial is necessary to permit him to formally enter a change of plea
3 pursuant to the terms of his agreement with the Government.

4 Counsel for the Government, Michelle Kerin, has no objection to this motion.

5 This motion finds further support in the Declaration of Noel Grefenson, which is filed
6 together with this motion.

7 Dated: November 10, 2011.

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9 */s/ Noel Grefenson*

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11 Noel Grefenson, OSB No. 88216
12 Attorney for Defendant
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